



at Furman Middle School, expenses of moving his child to private school, and costs and attorney's fees.

b. **Minor Doe** may testify regarding the problems he encountered at the school, his efforts to resolve the problems, his efforts to discuss same with his parents, the distress he was caused to suffer, and the problems that he has had as a result of his removal from Furman Middle School and the transfer to a private school.

c. **Sherry Phillips**, is the mother of the Plaintiff, Minor Doe. She will testify about her contact throughout this matter dealing with her son and his upset and with the son's father, and her efforts to resolve issues at Furman Middle School and/or at the District Office.

d. **Maria Newton-Tabon** is anticipated to testify regarding her enforcement of school policy and her placement of Minor Doe in ISS for dress code violations and other matters.

e. **Jeffery Barrineau** is expected to testify regarding his involvement at Furman Middle School and his interaction with Mr. Smith and Minor Doe.

f. **Dr. Gregory Jones** is anticipated to testify regarding his interactions with Mr. Smith and Minor Doe.

g. **K. Davis** is a school bus driver who is expected to testify about her reporting that Minor Doe was creating a disturbance on the bus consisting either of Minor Doe eating candy on the bus (as expressed to Mr. Smith at the time of the incident) or in

more boisterous behavior as reported to the school district but not reported to the parents, and other matters.

h. **Wesley Jones**, a parent whose daughter was reported for misconduct on the bus by K. Davis, but whose daughter was cleared as a result of an investigation by the District Office when it was determined that K. Davis had falsified the report regarding the daughter of Ms. Jones.

i. **Dr. Frank Baker** who is expected to testify regarding his takeover as Superintendent of Sumter School District and his investigation into the allegations made by bus driver K. Davis regarding one or more children on her school bus route, and possible other matters.

j. **Rick Nelson** with the Sumter Police Department will testify that Mr. Smith had talked to him prior to Mr. Smith going to Furman Middle School to hand out petitions.

k. **Lisa Thomas** will testify regarding problems she had at Furman Middle School in using the handicap ramp as access to school for her physically handicapped child.

l. **Kimberly Austin** who will testify that a homeless child in her care was placed in ISS due to improper shoes after said shoes were initially approved by Ms. Newton-Tabon.

m. **Dr. Cornelius Leach** will testify as to his knowledge of the incidents and facts involving this matter.

n. **Dr. Henrietta Green** will testify regarding her knowledge of matters set forth in this case including her meeting with Mr. Smith and Minor Doe.

o. **Jade McLeod** will testify regarding her knowledge of the matters set forth in this case.

Counsel for Plaintiff provided their voir dire under a separate document.

Respectfully submitted,

/s/ A. Paul Weissenstein, Jr.  
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Sumter, South Carolina